

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

Dr. Larry Camp and)
Sabrina Martindale,)
)
Plaintiffs,)
)
v.)
)
	Case No. 2:08 CV227-WKW-CSC
Correctional Medical Services, Inc.,)
Richard Allen, individually and in his)
official capacity as Commissioner Of)
Alabama Department Of Corrections,)
Ruth Naglich, in her official and)
individual capacity, and Laura)
Ferrell, individually and in her official)
capacity,)
)
Defendants.)

REPORT OF THE PARTIES' PLANNING MEETING

1. Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on May 9, 2008 and was attended by:
 - a) Lindsey C. Edelmann for Plaintiffs Dr. Larry Camp and Sabrina Martindale;
 - b) David B. Block for Defendant Correctional Medical Services, Inc.; and
 - c) Kim T. Thomas for Defendants Richard Allen, Ruth Naglich, and Laura Ferrell.
2. **Initial Disclosures.** The parties will exchange by June 9, 2008 the information required by Rule 26(a)(1).

3. **Discovery Plan.** The parties jointly propose to the court the following discovery plan:

- a) Discovery will be needed on the following subjects:
 - i) The claims and allegations in the Plaintiffs' Complaint; and
 - ii) The defenses and allegations in the Defendants' Answers.
- b) All discovery commenced in time to be completed by January 16, 2009.
- c) Maximum of 30 interrogatories by each party to any other party, exclusive of requests for authenticity. Maximum of 30 requests for production. Responses will be due within the time proscribed by the Federal Rules of Civil Procedure.
- d) Maximum of 30 requests for admission by each party to any other party, exclusive of requests for authenticity. Responses will be due within the time proscribed by the Federal Rules of Civil Procedure.
- e) Plaintiffs may each take a maximum of six (6) depositions, not to include nor limit the number of deposition of any expert.
 - i) Each deposition limited to maximum of 8 hours, unless extended by agreement of parties or court order.
- f) Defendants may each take a maximum of six (6) depositions, not to include nor limit the number of depositions of any expert witness.
 - i) Each deposition limited to maximum of 8 hours, unless extended by agreement of parties or court order.

- g) Reports from retained experts under Rule 26(a)(2) due:
 - i) by October 16, 2008, if the report relates to a party's affirmative claims;
 - ii) by November 16, 2008, if the report is responsive to another party's Rule 26(a)(2) report.
- h) Depositions of experts:
 - i) Expert depositions will take place by December 16, 2008.
 - ii) Supplementation under Rule 26(e) due by December 16, 2008.

4. **Other Items.**

- a) The parties DO NOT request a conference with the court before entry of the scheduling order.
- b) The parties request a pretrial conference on March 9, 2009.
- c) Parties should be allowed until August 18, 2008 to join additional parties or to otherwise amend the pleadings. A party has 14 days (unless granted additional leave of Court) to respond to any amended pleadings.
- d) All dispositive motions should be filed by January 16, 2009.
- e) The parties agree that settlement cannot be evaluated prior to undertaking substantial discovery.

- f) Final lists of witnesses and exhibits under Rule 26(a)(3) should be due:
 - i) From plaintiff(s): witnesses thirty (30) days prior to the beginning of the trial term; exhibits thirty (30) days prior to the beginning of the trial term;
 - ii) From defendant(s): witnesses thirty (30) days prior to the beginning of the trial term; exhibits thirty (30) days prior to the beginning of the trial term.
- g) Parties should have 15 days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).
- h) The case should be ready for trial by April 20, 2009 and at this time is expected to take approximately 3 days, exclusive of jury selection.

Respectfully submitted, this 15th day of May 2008.

/s/ Lindsey Camp Edelmann

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/s/ Kim T. Thomas
Kim T. Thomas
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Martindale,)
Plaintiffs,)
v.)
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Richard F. Allen, individually and)
in his official capacity as)
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Department of Corrections, Ruth)
Naglich, in her official and)
individual capacity, and Laura)
Ferrell, in her official and)
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Defendants.)

Case No. 2:08-cv-00227-WKW-CSC

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of May, 2008, I electronically filed the foregoing REPORT OF THE PARTIES' PLANNING MEETING with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to the following:

David B. Block, Esq.
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/s/ *Lindsey C. Edelmann*
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